



New York Civil Liberties Union
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June 4, 2025

VIA ECF

Hon. Frank P. Geraci, Jr.
United States District Judge
Western District of New York
United States Courthouse
100 State Street
Rochester, New York 14615

Re: *United States v. City of Rochester*, Case No. 6:25-cv-06226 (FPG)

Dear Judge Geraci:

We represent Proposed Intervenor-Defendants Third Presbyterian Church, Ibero-American Action League, Inc., New Hope Free Methodist Church, and the Western New York Coalition of Farmworker Serving Agencies in the above-captioned case. On June 4, 2025, Proposed Intervenor-Defendants filed their motion to intervene. ECF 9. Consistent with Federal Rule of Civil Procedure 24(c), Proposed Intervenor-Defendants filed with their motion to intervene their proposed motion to dismiss the complaint. ECF 11 (Declaration of Amy Belsher in support of Motion to Intervene, Ex. 5 (proposed notice of motion to dismiss), Ex. 6 (proposed memorandum of law)).

In reference to this Court's individual practice concerning "Opportunities for More Junior Lawyers," we write to request oral argument on both Proposed Intervenor-Defendants' motion to intervene, which would be argued by Gabriella Larios, and on their proposed motion to dismiss, which would be argued by Ifeyinwa Chikezie.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Amy Belsher

Amy Belsher
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Ifeyinwa Chikezie
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**Admission to W.D.N.Y. pending*